

REMARKS

I. Introduction

In response to the Office Action dated August 20, 2007, claims 1, 7, 13, 22, 31, and 38 have been amended, and 45-48 have been added. Claims 1-48 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. Prior Art Rejections

On pages 2-5 of the Office Action, claims 1-12 were rejected under 35 U.S.C. §102(b) as being anticipated by Son et al. (US 2001/0017920A1) (“Son”).

On page 6-8 of the Office Action, claims 13-44 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of Son in view of Mas Ribes (US 2006/0179489) (Mas Ribes).

Applicant traverses the above rejections. More specifically, neither Son nor Mas Ribes teach, disclose or suggest the transmission and use encryption keys between a host receiver and a client receiver when the client receiver does not utilize a conditional access module (CAM).

The independent claims are generally directed to a distributing content throughout a household network using a host IRD that receives the broadcast content via satellite and relays it for display by trusted light weight client boxes. More specifically, in claims 1 and 7, the claims provide for receiving and decrypting an encrypted media encryption key at a host receiver. The decrypted key is then re-encrypted by the host receiver using a pairing key. The re-encrypted key is transmitted from the host to the client. As amended, the client does not utilize a conditional access module (CAM). Thus, the client receiver is a light-weight box. Thereafter, the client decrypts the key using the pairing key. The host then receives encrypted program material and transfers the material to the client receiver. The client receiver decrypts the encrypted program materials using the decrypted media encryption key.

Similar to claims 1 and 7, claims 13 and 22 claim very similar limitations but further provide for the host receiver to use a conditional access module (CAM). In this regard, the first portion of claims 13 and 22 provide for the synchronization between the CAM and the host. The second part transmits the materials and keys to the client.

Similar to claims 1, 7, 13, and 22, claims 31 and 38 first synchronize the CAM on the host with the client receiver and then send program materials from the host to the client.

One unique aspect about all of the claims is that the client is a light-weight client and does not utilize a CAM. Further, the new dependent claims 43-48 provide that the light-weight client also lacks a tuner and explicitly provides that the host utilizes a CAM.

In rejecting claims 1-12, the Office Action relies exclusively on Son. Applicants note that Son fails to teach, describe, or suggest, explicitly or implicitly, the use of a light-weight client receiver. More specifically, Son does not hint at or remotely allude to the use of a client box that does not have nor utilize a conditional access module (CAM). Instead, Son is directed towards video-on-demand distribution networks (see paragraph [0007]) and a standard distribution network which is commonly known to include and utilize conditional access modules (CAMs). To further distinguish Son from these claims, the new dependent claims provide that the host receiver utilizes a CAM. Thus, when viewing the independent and dependent claims, the host receiver utilizes a CAM while the client receiver does not serve to clearly distinguish Son (which provides no description of a CAM whether used in a client or host).

The remaining claims were rejected based on Son in view of Mas Ribes. Applicants note that Mas Ribes expressly requires the use of a CAM (see paragraphs [0002], [0039], [0073], and [0104]). For example, paragraph [0104] provides:

[0104] The device according to the invention must be a secure device, in the meaning as defined above, capable of performing cryptographic operations and condition verification operations, such as smart cards or PCMCIA cards. (EMPHASIS ADDED)

Thus, not only does Mas Ribes not teach the lack of utilization of a CAM, as claimed, but Mas Ribes actually teaches away from the present invention by requiring a CAM. In this regard, even if one interprets Son as not requiring the use of a CAM, it cannot be combined with Mas Ribes to produce the claimed invention because Mas Ribes explicitly and expressly requires a CAM throughout Mas Ribes' specification.

Moreover, the various elements of Applicants' claimed invention together provide operational advantages over Son and Mas Ribes. In addition, Applicants' invention solves problems not recognized by Son and Mas Ribes. In this regard, while the present invention is directed towards

the use of lightweight client boxes in a home network, neither Son nor Mas Ribes even recognize the use or possible use of a home network or any problems associated with such a network.

Thus, Applicants submit that the independent claims are allowable over Son and Mas Ribes. Further, the dependent claims are submitted to be allowable over Son and Mas Ribes in the same manner, because they are dependent on the independent claims, and thus contain all the limitations of the independent claims. In addition, the dependent claims recite additional novel elements not shown by Son and Mas Ribes.

III. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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